

# Exhibit B

**C L I F F O R D**  
**C H A N C E**

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25 June 2019

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Dear Sir/Madam

[REDACTED]

In advance of Dr Lynch's testimony, we write to inform you of the following updates to the Witness Statement of Dr Michael Richard Lynch dated 14 September 2018.

1.

[REDACTED]

2.

[REDACTED]

3.

[REDACTED]

117672-3-6879-v1.0

70-40538856

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EXH 17592-0001

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4. At paragraph 170(d), Dr Lynch stated that Autonomy sent HP's advisors spreadsheets detailing its revenue breakdown for 2009 and 2010, including hardware revenue. At paragraph 633, Dr Lynch explained further that he had learned that, on 16 and 17 August 2011, Mr Kanter and Mr Chamberlain sent sales data to Morgan Lewis for the purposes of an antitrust filing. Dr Lynch understood that the spreadsheets were sent to Autonomy's advisors, Morgan Lewis, for onward submission to HP's advisors. He therefore assumed that they had been provided to HP's advisors. Mr Robins of Morgan Lewis has since provided a witness statement explaining that these spreadsheets were not provided to HP's advisors (see Mr Robins' statement at paragraph 8). Dr Lynch was not aware of that fact when he provided his witness statement. He has no reason to dispute Mr Robins' evidence.

5.



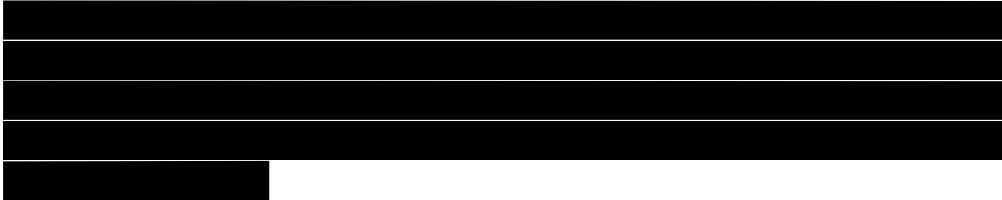
6.



7.



8.



Yours faithfully



**Clifford Chance LLP**

United States District Court  
Northern District of California

**Trial Exhibit 17592**

Case No: CR 18-0577 CRB

Date Entered: \_\_\_\_\_

By: \_\_\_\_\_

Deputy Clerk